

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RONALD A. KATZ TECHNOLOGY
LICENSING, L.P.,

Plaintiff.

v.

AMERICAN INTERNATIONAL GROUP, INC.
et al.,

Defendants.

C.A. No. 06-547 (GMS)

**REPLY OF PLAINTIFF RONALD A. KATZ TECHNOLOGY
LICENSING, L.P. TO WILMINGTON TRUST COMPANY AND
WILMINGTON BROKERAGE SERVICES COMPANY'S COUNTERCLAIMS**

Plaintiff Ronald A. Katz Technology Licensing, L.P. (“Katz Technology Licensing”) replies to the counterclaims of Defendants Wilmington Trust Company and Wilmington Brokerage Services Company (collectively “Wilmington Trust”) as follows:

THE PARTIES

1. Katz Technology Licensing admits that Wilmington Trust alleges in Paragraph 129 of its Answer and Counterclaims that Wilmington Trust Company is a corporation organized under the laws of the State of Delaware having a principal place of business at 1100 North Market Street, Wilmington, Delaware 19890.

2. Katz Technology Licensing admits that Wilmington Trust alleges in Paragraph 129 of its Answer and Counterclaims that Wilmington Brokerage Services Company is a is a corporation organized under the laws of the State of Delaware having a principal place of business at 1100 North Market Street, Wilmington, Delaware 19890.

3. Katz Technology Licensing admits that the Wilmington Trust Defendants refer to themselves in their Answer and Counterclaims as “Wilmington Trust” as alleged in Paragraph 131 of Wilmington Trust’s Counterclaims.

4. Katz Technology Licensing admits that it is a California limited partnership with its principal place of business at 9220 Sunset Boulevard, Suite 315, Los Angeles, California 90069 as alleged in Paragraph 132 of Wilmington Trust's Counterclaims.

JURISDICTION AND VENUE

5. Katz Technology Licensing admits that (a) this Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a); and (b) Wilmington Trust purports to bring its counterclaims for a declaratory judgment pursuant to 28 U.S.C. § 2201, as alleged in Paragraph 133, but denies the viability of that request. Katz Technology Licensing denies the remaining allegations set forth in Paragraph 133 of Wilmington Trust's Counterclaims.

6. Katz Technology Licensing admits that venue is proper in this judicial district pursuant as alleged in Paragraph 134 of Wilmington Trust's Counterclaims.

COUNT ONE

(Declaratory Judgment of Invalidity of the Patents-In-Suit)

7. In response to Paragraph 135 of Wilmington Trust's Counterclaims, Katz Technology Licensing realleges and incorporates by reference Paragraphs 1 through 8 of this Reply as if fully set forth herein.

8. Katz Technology Licensing admits that it is the sole holder of entire right, title, and interest in the patents identified in Paragraph 136 of Wilmington Trust's Counterclaims, referred to herein as the '021, '065, '120, '134, '150, '156, '223, '252, '285, '360, '415, '551, '703, '734, '762, '863, '893, '965, '968, and '984 Patents.

9. Katz Technology Licensing admits that it has alleged that Wilmington Trust is infringing, actively inducing the infringement of, or contributing to the infringement of one or more claims of the '065, '120, '134, '150, '223, '252, '285, '360, '551, '734, '863, '893, '965, '968, and '984 Patents. Katz Technology Licensing denies that it has alleged that

Wilmington Trust is infringing, actively inducing the infringement of, or contributing to the infringement of the '021, '156, '415, '703 or '762 Patents.

10. Katz Technology Licensing denies the allegations set forth in Paragraph 138 of Wilmington Trust's Counterclaims.

11. Katz Technology Licensing admits that there is an actual controversy between the parties with respect to Wilmington Trust's infringement of the patents identified in Paragraph 93 of Katz Technology Licensing's Complaint. Katz Technology Licensing denies the remaining allegations set forth in Paragraph 139 of Wilmington Trust's Counterclaims.

COUNT TWO

(Declaratory Judgment of Non-Infringement of the Patents-In-Suit)

12. In response to Paragraph 140 of Wilmington Trust's Counterclaims, Katz Technology Licensing realleges and incorporates by reference Paragraphs 1 through 8 of this Reply as if fully set forth herein.

13. Katz Technology Licensing admits that it is the sole holder of entire right, title, and interest in the patents identified in Paragraph 141 of Wilmington Trust's Counterclaims, referred to herein as the '021, '065, '120, '134, '150, '156, '223, '252, '285, '360, '415, '551, '703, '734, '762, '863, '893, '965, '968, and '984 Patents.

14. Katz Technology Licensing admits that it has alleged that Wilmington Trust is infringing, actively inducing the infringement of, or contributing to the infringement of one or more claims of the '065, '120, '134, '150, '223, '252, '285, '360, '551, '734, '863, '893, '965, '968, and '984 Patents. Katz Technology Licensing denies that it has alleged that Wilmington Trust is infringing, actively inducing the infringement of, or contributing to the infringement of the '021, '156, '415, '703 or '762 Patents.

15. Katz Technology Licensing denies the allegations set forth in Paragraph 143 of Wilmington Trust's Counterclaims.

16. Katz Technology Licensing denies the allegations set forth in Paragraph 144 of Wilmington Trust's Counterclaims.

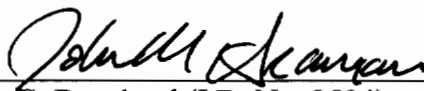
17. Katz Technology Licensing admits that there is an actual controversy between the parties with respect to Wilmington Trust's infringement of the patents identified in Paragraph 93 of Katz Technology Licensing's Complaint. Katz Technology Licensing denies the remaining allegations set forth in Paragraph 145 of Wilmington Trust's Counterclaims.

PRAYER FOR RELIEF ON WILMINGTON TRUST'S COUNTERCLAIMS

Katz Technology Licensing respectfully requests that in response to Wilmington Trust's Counterclaims this Court:

1. Dismiss Wilmington Trust's counterclaims with prejudice;
2. Adjudge that Wilmington Trust is not entitled to any relief, including any of the relief requested in Wilmington Trust's prayer for relief; and
3. Award to Katz Technology Licensing the relief requested in its Complaint and such other relief as the Court may deem appropriate and just under the circumstances.

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DATED: November 13, 2006

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2006, I electronically filed the foregoing
**Reply of Ronald A. Katz Technology Licensing, L.P. to Defendants Wilmington
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with the Clerk of Court using CM/ECF, which will send notification of such filing to the
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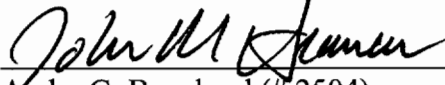
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A handwritten signature in black ink, appearing to read "John M. Seaman", is written over a horizontal line.

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